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23 **UNITED STATES DISTRICT COURT**
24 **FOR THE DISTRICT OF NEVADA**

25 **FEDERAL TRADE COMMISSION, and**

26 **STATE OF NEVADA,**

27 Plaintiffs,

28 v.

INTERNATIONAL MARKETS LIVE,
INC., et al.,

Defendants.

Case No. 2:25-cv-00760-CDS-NJK

**PLAINTIFFS' STATUS REPORT
REGARDING SERVICE OF
PROCESS AND MOTION TO FILE
PRELIMINARY INJUNCTION
MOTION IN EXCESS OF PAGE
LIMIT**

1 Plaintiffs Federal Trade Commission (“FTC”) and State of Nevada filed their redacted
2 Complaint [ECF No. 1] and Motion to File Preliminary Injunction Motion in Excess of Page
3 Limit (the “Page Limit Motion”) [ECF No. 13], on May 1, 2025. Plaintiffs now respectfully
4 submit this status report regarding service of process and the Page Limit Motion.
5

6 Plaintiffs brought this action after engaging with Defendants in a consent process aimed
7 at avoiding litigation. Each Defendant, represented by counsel, received drafts of Plaintiffs’
8 proposed complaint and proposed final order, and had the opportunity to meet with the then-
9 director of the FTC’s Bureau of Consumer Protection, FTC Chairman Andrew N. Ferguson, FTC
10 Commissioners Melissa Holyoak and Mark R. Meador, and staff from the Nevada Attorney
11 General’s Office. Although no Defendant’s counsel has filed a notice of appearance, Plaintiffs
12 know their identities and contact information because of that consent process. Plaintiffs
13 submitted a list of Defendants’ counsel as Attachment C to the Civil Cover Sheet [ECF No. 1-1].
14

15 **Service of Process**

16 All Defendants have either (a) been served with process, (b) accepted, by agreement,
17 email service of process through counsel, or (c) had counsel represent that they were authorized
18 to waive service of process under Federal Rule of Civil Procedure 4(d). Accordingly, Plaintiffs
19 have filed returns of service [ECF Nos. 19, 21, and 22] or service-waiver forms [ECF Nos. 15-
20 18, 20, 23, and 24] for all Defendants.

21 **Page Limit Motion**

22 Counsel for Defendants Alex Morton, Jason Brown, Matt Rosa, and Global Dynasty
23 Network, LLC, have stated that they do not oppose the Page Limit Motion. Counsel for Brandon
24 Boyd and the IML Defendants¹ have not taken a position on the Page Limit Motion, asserting
25
26

27 ¹ International Markets Live, Inc., IM Mastery Academy, Ltd., Assiduous Inc., Christopher
28 Terry, and Isis Terry.

1 that they cannot evaluate it without reviewing the 61-page preliminary injunction motion
 2 Plaintiffs are seeking leave to file.²

3
 4 Plaintiffs' counsel emailed the Page Limit Motion to Defendants' counsel and asked them
 5 to confirm that they would accept email service of court filings before formally appearing in this
 6 action. All but one, who represents the IML Defendants, agreed to do so.³ Accordingly, on May
 7 9, 2025, Plaintiffs sent by first class U.S. mail paper copies of ECF No. 13, as well as all
 8 requested summonses [ECF Nos. 2-12], issued summonses [ECF No. 14], returns of service
 9 [ECF Nos. 19, 21, and 22], and service-waiver forms [ECF Nos. 15-18, 20, and 23], to counsel
 10 for the IML Defendants.⁴

11 Therefore, as of May 9, 2025, the Page Limit Motion has been served on all Defendants
 12 in accordance with Federal Rule of Civil Procedure 5.⁵

13
 14 Respectfully submitted,

15
 16 Dated: May 12, 2025

17 /s/ Joshua A. Doan
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22 ² Plaintiffs complied with LR 7-3(c) by filing a Declaration of FTC Counsel in support of the
 23 Page Limit Motion but are awaiting leave of Court before filing their preliminary injunction
 motion.

24 ³ Plaintiffs emailed the Page Limit Motion to Defendant Boyd's counsel on May 2, and on May 5
 25 they agreed to accept email service of filings before formally appearing in this action.

26 ⁴ Plaintiffs have emailed as-filed copies of the requested and issued summonses, returns of
 service, and service-waiver forms to counsel for the other five Defendants.

27 ⁵ On May 12, 2025, Plaintiffs sent by U.S. mail the final service-waiver form [ECF No. 24] to
 28 counsel for the IML Defendants.

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Certificate of Service

I hereby certify that on May 12, 2025, I electronically filed the foregoing Plaintiffs' Status Report Regarding Service of Process and Motion to File Preliminary Injunction Motion in Excess of Page Limits with the Clerk of the Court using CM/ECF. Because no counsel have entered appearances for Defendants, I caused a copy of the same to be served on all parties in the manner specified below.

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